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Comparative analysis of risks for political independence of public service media across 19
European Union member states. Working Paper. European University Institute, Italy. .
[Monograph] (doi:EUI RSCAS; 2016/34)

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Comparative analysis of risks for political independence
of Public Service Media
across 19 European Union Member States

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**Comparative analysis of risks for political independence of
Public Service Media across 19 European Union Member States**

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ISSN 1028-3625

© Maja Šimunjak, 2016

Printed in Italy, July 2016

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I – 50014 San Domenico di Fiesole (FI)

Italy

www.eui.eu/RSCAS/Publications/

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Abstract

This paper examines risks for political independence of public service media in European Union Member States by examining safeguards for guaranteeing independence of public service media's governance and its funding mechanisms. The analysis was conducted in 19 EU countries through a questionnaire-based method. Local experts from each of the examined countries evaluated media policy on the appointment procedures for management and board functions in the PSM, and mechanisms of providing funding to the PSM by the government. In addition to examining media policy related to these issues, local teams also evaluated the extent to which these are implemented. The results show that in five out of 19 analysed countries local experts have described media policy as insufficient in providing fair, objective and transparent appointment procedures for management and board functions in PSM. Furthermore, more than half of the countries which considered national media policy on appointment procedures to be well defined in safeguarding PSM's independence, declared some degree of risk in the implementation of this policy, pointing to situations in which the government or other political groupings have in the past few years tried to interfere with the appointment processes. Also, results show that there are large differences in the mechanisms of PSM funding. Overall, results point to differences in media policies concerned with PSM's governance and funding among EU countries, with many risks associated with these policies and their implementation.

Keywords

Comparative analysis, public service media, European Union, political independence, risk.

Introduction

Public service media is considered to be the ‘cornerstone of democracy’ (Bardoel and dHaensen 2008: 350), and much has been written about the ways in which it contributes to democratic and societal processes, particularly in Europe. Due to its perceived importance, it is also recognized in the Treaty of Amsterdam (CEC, 1997:109) that explicitly states that ‘the system of public broadcasting in the [European Union] Member States is directly related to the democratic, social and cultural needs of each society and to the need to preserve media pluralism.’

This paper reports data from the Media Pluralism Monitor 2015 project¹, which aims to identify risks to media pluralism in Member States of the European Union. Particularly, the paper focuses on the part of the project whose aim was to identify media policies, and the ways in which these are implemented, related to safeguarding political independence of public service media across 19 Member States of the European Union.

Accordingly, the main research question which the paper aims to address is: At what kinds of risks from the influences of the state are the European public service media?

One of the main reasons why political independence of the PSM is considered important is because it is believed that PSM under political influence might produce content which is biased in favour of the government and parties that support it. This would mean that the PSM does not represent all political viewpoints in a society in a fair and balanced way. Consequently, it is feared that such content may reduce voters’ ability to make rational and well-informed decisions. In the words of Mona Krewel, ‘[t]he autonomy of PSM is an elementary precondition for pluralistic media coverage and hence for a functioning democracy’ (2015: 126). It can be argued the independence of the PSM is particularly important in Europe, since PSM are usually among the most watched television programs in European countries, consumed by more than a third of the television audience in countries where they are strongest (Benson and Powers, 2011; Klimkiewicz, 2015). Hence, they matter due to their wide reach.

The findings of this analysis allow mapping the state of play of the political independence of PSM systems in EU countries, and contribute to identifying elements of PSM systems which are most at risk from political interference and best practices of how these risks can be mitigated.

Political Influence Over PSM

It is claimed that governments have always been partners to European PSM² (Bardoel and dHaensen, 2008), although it should be acknowledged that the relationship between many governments and PSM was sometimes far from being a partnership. Rather, in many cases and over many decades governments of various EU countries have tried to exert political influence over PSM and its content, leading Papathanassopoulos (2007:153) to conclude that ‘disputes over the independence of public broadcasting are general to the history of European media’. Indeed, Mungiu-Pippidi (2003: 40) noted writing in the early 2000s that the independence of PSM in Europe is still ‘unfinished business’, even

¹ More information about the project is available here: <http://monitor.cmpf.eui.eu/>. The author participated in the implementation of the Media Pluralism Monitor 2015 as part of the Centre for Media Pluralism and Media Freedom (EUI), together with Elda Brogi, Lisa Ginsborg, Alina Ostling and Pier Luigi Parcu.

² In spite of the fact that almost all countries in the world have a PSM of some kind; it needs to be acknowledged that there are many differences between PSM systems. The focus of this paper is on the PSM systems in Europe. European PSM are characterised by the low cost of accessibility, high availability, promotion of diversity and pluralism, catering for minorities, and overall focus on political, cultural, and educational content (Bardoel and dHaensen, 2008; Papathanassopoulos, 2007; Smith 2012), which is not how PSM necessarily function in other parts of the world.

in its Western parts. This paper follows Mungiu-Pippidi's definition of the independence of the public service media according to which PSM's independence from political influences is defined as the ability of 'both managers and journalists to run public service television and its programs as they see fit and without government interference' (2003: 34).

The Council of Europe emphasized in its Recommendation to Member States on public service media governance (2012) that many European countries still face the challenge of securing independence from political influences, which are usually exerted by the government. Despite the fact that PSM in almost all EU Member States face a range of challenges, the most problematic systems from the viewpoint of their political independence appear to be those in Southern and Central Eastern Europe. It is argued that the appointments of the PSM boards in the countries of the Central Eastern Europe are one of the most common techniques of retaining control over public media (Jakubowicz, 2008), since 'political groups both on the right and the left of the political spectrum share a common conception of the media as an instrument of political power, and public service television in particular as *the* instrument of political power' (Mungiu-Pippidi, 2003: 43, see also Bajomi-Lázár, 2015). The most recent case comes from Poland, which introduced new legislation in early 2016 that grants the government control over appointing and dismissing public service media's management boards (Klimkiewicz, 2016).

European post-communist countries are not the only ones historically seen as struggling with the independence of PSM, since South European governments have been (in)famous for their control over PSM through appointments as well. Appointments to the PSM boards based on partisan political criteria were common in countries such as Spain and Greece for decades, and they were also seen as a mechanism of a clientelistic society since they were used for returning favours by political elites to their supporters (Papatheodorou and Machin, 2003). It should be added that these types of appointments not only diminish the political independence of the PSM, but they can also be problematic for the functioning of the PSM. Where politically appointed members do not have sufficient skills and knowledge to make well-informed decisions from which the PSM would benefit, these deficiencies of the management structures may create further problems for this media. Overall, Jakubowicz (2008) argues that the PSM systems in the Central Eastern and Southern Europe share many similarities. However, rare studies engage in comparative analysis of the PSM systems, and particularly their political independence.

The most recent attempt to compare PSM systems and examine their political independence was Media Pluralism Monitor 2014 project (MPM2014) which examined the risks for political independence of PSM across nine EU countries³. The MPM2014 examined both the legal framework in which PSM operate, and the extent to which the legislation is implemented and in practice ensures PSM's independence (Brogi and Dobрева, 2015). It was found that Hungary and Italy are at high risk from political interference through appointment procedures to PSM boards, while Hungary was also declared as being at high risk from political control through the ways in which their PSM was funded, alongside Estonia and Greece.

The MPM2014 findings were in line with those from the European Media Systems survey (2010). This survey asked experts in European media questions about European countries' media systems, one of the questions being about the level of political independence of the PSM. Experts' evaluations revealed that the PSM in Nordic countries (Norway, Denmark, Finland, Sweden) are seen as most independent from political influences, while those in Southern and Central Eastern Europe were declared least independent (of the EU countries lowest independence has been estimated in Italy, Malta, Romania and Slovakia). It should be noted that these findings primarily revealed the perception of a PSM's independence, rather than their actual independence, since the answers were based on experts' evaluations. However, both MPM2014 and the European Media Systems survey show that the

³ Belgium, Bulgaria, Denmark, Estonia, France, Greece, Hungary, Italy, United Kingdom

old practices of political elites trying to exert influence over the PSM in South and Central Eastern Europe are far from being the matters of the past. They also point to the fact that these issues should be regularly monitored in order for the public and stakeholders to be aware of the challenges and risks associated with the PSM.

What to monitor?

The Council of Europe's Recommendation to Member States on public service media governance (2012) outlines steps which should be taken for strengthening PSM's independence in Europe, primarily focusing on the development of appropriate funding processes and appointment procedures for the PSM board(s). Indeed, PSM funding and appointment procedures to their board(s) are those mechanisms which are most frequently described as the most important for securing political independence of a PSM (Bardoel and dHaensen, 2008; Benson and Powers, 2011; Hanretty, 2009; Papatheodorou and Machin, 2003), and are hence among the most important ones to regularly monitor.

The way in which PSM is funded is, according to Bardoel and dHaensen (2008: 349), the key issue related to the PSM's political independence, and it has also been identified as important for securing political independence by the European Parliament. In its Resolution on public service broadcasting in the digital era (2010), European parliament recommended to the EU Member States to 'provide appropriate, proportionate and stable funding for public service media so as to enable them to fulfil their remit, guarantee political and economic independence'. Most authors agree that the best way to fund PSM in such a way as to ensure its independence from the state, but also retain a stable revenue of income, is through the system of licence fees (Bardoel and dHaensen, 2008; Benson and Powers, 2011; Berg and Lund, 2012; Klimkiewicz, 2015). However, it should be noted that the state may have an influence even on the licence fee funded PSM, since it is usually the state which decides on the level of the licence fee. In order to minimise this potential risk, The Council of Europe (2012) recommends, among other things, that the state needs to ensure that the set level of financing is adequate to meet PSM's needs and that PSM should participate in the decision-making about the level of financing. In other words, the state shouldn't be able to decide the level of licence fee without consultations and taking into account the financial needs of the PSM. On the other side of the spectrum are usually direct state grants to the PSM, which are often seen as tools through which the state can try to influence the PSM (Berg and Lund, 2012; Mungiu-Pippidi, 2003; Klimkiewicz, 2015). As Papatheodorou (2007) argues, even if the state does not try, or succeed, in exerting pressure over the PSM through providing direct grants, PSM can still be harmed by this type of funding since it can affect the perception of their independence in the eyes of the public. Indeed, there is evidence to suggest that PSM's political independence is correlated with the trust in PSM, so the more the state is able to influence the PSM, the less trust in its content citizens have (Connolly and Hargreaves Heap, 2007). In light of this, the fact that the average percentage of state grants in overall financing increased from 10 to 13.3% among European Broadcasting Union's public service members from 2011 to 2012 (Klimkiewicz, 2015), might be a cause for concern, or at least a call for better monitoring of the public service media's political independence.

The other instrument through which the state may be able to control the PSM concerns the appointment of its governing body(ies). Council of Europe (2012) holds that it is 'legitimate for the State to be involved in the appointment of the highest supervisory or decision-making authority within the public service media'. However, it also emphasises that the appointment processes should be designed in such a way as to guarantee independence of the PSM from the state. For example, legislation should clearly outline the appointment and dismissal procedures, contain elements which would minimise state's ability to appoint partisan members, appointments should be made for a specified term, situations in which members can be dismissed should be limited and legally defined etc. In addition, it is suggested that that appointments made for a longer period of time might increase PSM's independence since board members may be less inclined to promote preferences of those that

appointed them (Hanretty, 2009). Also, it is speculated that involvement of a larger number of political actors in the appointment process may lead to greater independence since ‘the match between any appointing actor and the appointed person will be looser’ (Hanretty, 2009: 84). To illustrate, it is expected that the PSM would be more independent if the parliament decides on its appointments, rather than the government. Of course, this may not always be the case, since in parliamentary democracies, which are many EU countries, the government usually has the majority in the parliament. For example, Mungiu-Pippidi (2003) noted that the legislative changes which transferred the competence over appointments of the PSM boards from governments to parliaments in the Central Eastern Europe in 1990s did little to decrease political influence over the PSM.

In sum, comparative research into political independence of European PSM is limited, and rare existing studies point to the fact that many PSM systems in EU Member States are still vulnerable to political influences. This paper aims to contribute to the monitoring of PSM’s political independence by establishing risks for political independence of PSM across EU Member States. Accordingly, the main research question which this paper aims to answer is:

At what kinds of risks from the influences of the state are the European public service media?

Research Design

This paper reports on the findings from the Media Pluralism Monitor 2015, a study consequent to that mentioned earlier (MPM2014), in which the risks for political independence of the PSM have been examined in the 19 EU countries not tested in the 2014 project. Particularly, the paper focuses on the part of the project whose aim was to identify media policies related to safeguarding political independence of public service media. This was done by examining legal safeguards for guaranteeing independence of public service media’s management and its funding mechanisms, but also by evaluating the extent to which these legal safeguards are actually implemented and the PSM is independent in practice.

The analysis was conducted in 19 Member States of the EU⁴ through a questionnaire-based method. Local teams from each of the examined countries evaluated media policy on the appointment procedures for management and board functions in the PSM, and mechanisms of providing funding to it by the state. The evaluations of the actual independence of the PSM needed to be supported by evidence. Furthermore, some of these indicators have also been subjected to the group of experts’ revision. This procedure entailed a number of national experts in media freedom reviewing local teams’ evaluations, and providing alternative evaluations supported by evidence when appropriate. In situations where any of the national experts disagreed with the evaluation of the country team, the team needed to amend their answer or explain why the disagreement wasn’t taken into account in providing the final answer (for more details about project’s methodology see Brogi et al., 2016).

The decision to focus on the PSM management and funding was based on the existing literature and previous studies which outlined these two mechanisms as most important for securing political independence. In line with the ideas put forward by Hanretty (2009) and in line with the MPM2014 study, indicators to assess the independence were divided into *de iure*, assessing legal framework, and *de facto*, aiming to assess the extent to which PSM is independent in practice⁵. *De iure*/legal questions

⁴ Austria, Croatia, Cyprus, Czech Republic, Finland, Germany, Ireland, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden

⁵ Hanretty (2009) was among the first ones to raise the question about the connection of the *de jure* independence, which can be measured by the examination of the legal framework in which a PSM operates, and its actual, *de facto* independence. He argues that legislation may not be completely clear or enforced, so examining the regulations does not necessarily tell us whether or not a PSM is actually independent in practice. In order to test the connection between the *de jure* and *de facto* independence, Hanretty created an index of *de jure* independence consisting of several indicators (including PSM funding, and appointment and dismissal procedures for its board) and examined its correlation with

had the option to be answered as yes or no, while *de facto*/practice questions were coded as low, medium, or high risk. Each answer was calibrated on a scale from 0 to 1, with 0 describing a situation of low risk, and 1 situation of high risk. Specifically, each ‘yes’ and ‘low risk’ answer were coded as 0, ‘medium risk’ as 0.5, while ‘no’ and ‘high risk’ answers were coded as 1. Two other answer options were offered for each question – ‘not applicable’ and ‘no data’. Answers coded as ‘not applicable’ were excluded from the analysis. Each ‘no data’ answer had to be accompanied by a local team’s comment in which the team evaluated whether or not the lack of data should be seen as problematic within the national context. Two independent coders then recoded the ‘no data’ answer as showing either low or high risk according to a strict set of criteria. For each of the two examined mechanisms (management and funding) the value of the *de iure* and *de facto* independence was calculated as the mean of all its indicators, the value of the mechanism is the mean of its *de iure* and *de facto* elements, and the final risk for the independence of the PSM is measured as the mean of the two mechanisms.

Table 1: Index of risk for PSM independence⁶

Management – de iure/legal	Management – de facto/practice	Funding – de iure/legal	Funding – de facto/ practice
<p>1. Does the law (e.g. media law, administrative law, company law, labour law, conventions between PSM and the government) provide fair, objective and transparent appointment procedures for management and board functions in PSM?</p> <p>2. Is there an administrative or judicial body tasked to actively monitor the compliance with these rules and/or hearing complaints?</p> <p>3. Does the law grant that body effective sanctioning/enforcement powers in order to impose proportionate remedies in case of noncompliance with the rules?</p>	<p>4. Do these appointment procedures guarantee the independence of PSM boards and management from government and/or a single political group?</p> <p>5. Are the legal safeguards for appointment and dismissal procedures for management and board functions in PSM implemented in practice?</p>	<p>1. Does media law prescribes transparent and objective procedures on determining the amount of money to be granted to PSM?</p>	<p>2. How would you describe the mechanism of providing financing to the PSM by the government?</p> <p>3. What is the percentage of direct government financing for the PSM?</p>

(Contd.) _____

PSM’s *de facto* independence which was measured through a proxy based on the executive turnover. The results showed that well established legal framework which guarantees political independence of the PSM indeed ensures its independence, but only when the size of the market for news is taken into account. In other words, ‘assuming average press circulation, an increase from no legal protection to full legal protection would result in an increase from negligible to almost total *de facto* independence’ (ibid., 88).

⁶ For questions’ descriptions and methods of measurement see Brogi et al. (2016)

It should be emphasised that this is a risk-based exercise in which the final score, which is presented as a percentage on a scale from 0 to 100, represents the degree of risk for the PSM political independence. This means that a high risk does not necessarily mean that the PSM is not independent, but that it is vulnerable to political influences⁷. Accordingly, a low risk assessment does not mean that a PSM is not under political influence, but rather that some appropriate safeguards of its political independence exist. Finally, scores between 0 and 33% are considered low risk, 34 to 66% medium risk, while those between 67 and 100% high risk.

Findings

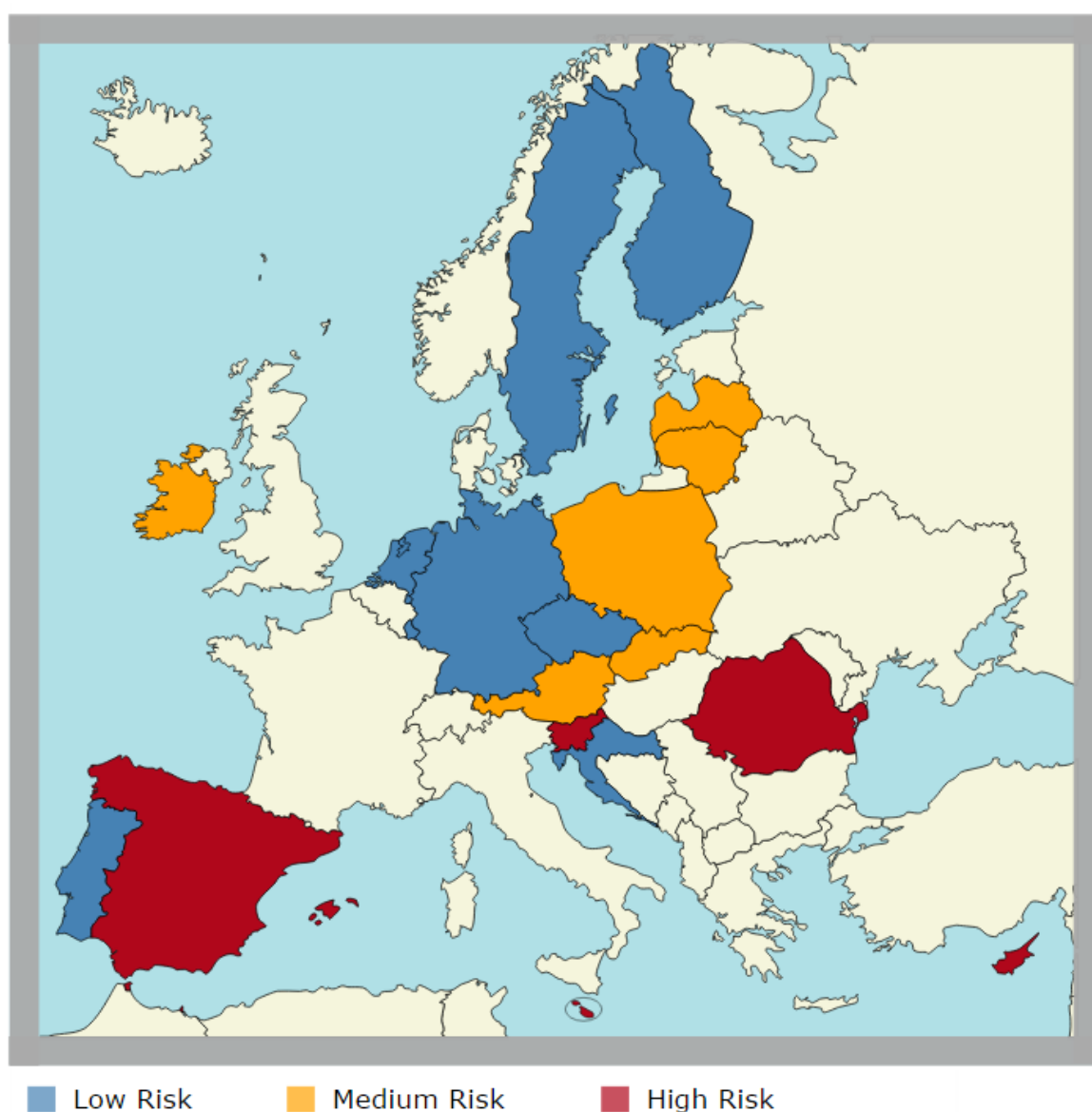
The main finding of this study is that public service media in some Member States of the EU are still at high risk from political influences, and that overall, there are many differences among EU states in the type of risk for political independence, but also its extent. This study reinforces findings from previous studies in the sense that North and Western European PSM systems seem to be at less risk from political influences, than those in Southern and Central Eastern Europe.

Specifically, the analysis showed that five EU countries have PSM with high risk for political independence (Cyprus, Malta, Romania, Slovenia, and Spain), six countries are at medium risk (Austria, Ireland, Latvia, Lithuania, Poland⁸, and Slovakia), while in eight countries the risk for PSM independence is low (Croatia, Czech Republic, Finland, Germany, Luxembourg, Netherlands, Portugal and Sweden).

⁷ More details about risk assessments can be found in Brogi and Dobrova (2015)

⁸ It should be noted that research took place during May – June 2015, and hence did not capture legislative changes related to appointment of PSM boards in Poland which took place in January 2016.

Map 1: Risks for political independence of the PSM in 19 EU Member States



In spite of the fact that Southern and Central Eastern European countries in general score medium and high risk, and Northern and Western European countries low risk, there are notable exceptions to this. One of these is Portugal, a Southern European country which was mentioned as being one of those in which political elites historically tried to influence PSM. However, Portugal is an interesting example of how the risk for the political independence of the PSM can decrease with the introduction of appropriate legislation. In particular, Portugal introduced several novelties in the legal framework related to the PSM over the past few years which, according to the local team, decreased state's possibilities of influence. For example, in 2014 Independent general council, tasked with appointing PSM board members according to a set of clear, objective and transparent criteria, was established to act as a buffer between the state and the PSM. However, it remains to be seen how these legislative changes will be implemented and with what effects on political independence of Portuguese PSM, so further monitoring is essential. Also, direct grants to the Portuguese PSM were abolished in 2013. Furthermore, Czech Republic is an example of a Central Eastern European country which scores low risk, although at its higher end. In particular, this is due to the fact that there is no body which would

monitor the implementation of a well-established legislation concerning appointment procedures, and also there have been certain attempts of political interference with the appointments in the past couple of years. However, the majority of funding for the PSM comes from the licence fee which is enumerated in the law and can only be amended by the parliament, what creates a low risk situation for PSM funding. It is also worth emphasising the case of Ireland, whose PSM is assessed as at medium risk from political influences. This is primarily due to the fact that the state has great influence over the appointments and dismissals of the PSM board members.

Risks From Management

The analysis of the legislation concerning appointments to the PSM boards showed that in five out of 19 examined countries (Cyprus, Ireland, Malta, Slovenia, and Spain) the law does not provide fair, objective, and transparent appointment procedures of the PSM board, which would minimise state's ability to exert influence. Furthermore, six out of 14 countries which do have good legislation do not have a body which would monitor its implementation and hear complaints (Austria, Croatia, Czech Republic, Netherlands, Romania, and Slovakia), so it may be much easier to interfere with the law if there is no institution which oversees it and is in control of its implementation. In addition, of the countries that have appropriate legal safeguards and bodies monitoring their implementation, in one case this body is not granted effective powers which would give it legitimacy and ability to effectively supervise implementation of the law (this is the case in Poland). In sum, only seven out of 19 studied PSM systems have appropriate legal safeguards which might help them in avoiding political influence via appointment procedures (these are Finland, Germany, Latvia, Lithuania, Luxembourg, Portugal, and Sweden).

However, as noted by Hanretty (2009), legal safeguards do not always guarantee independence in practice, what is shown by this research as well. In particular, three out of seven countries with appropriate legal safeguards have some problems in the implementation of these laws, with evidence of political actors trying to influence management boards of the PSM (Finland, Latvia, Sweden). Overall, only four countries in the sample have appropriate laws which are well implemented and are securing the independence of the PSM management (Germany, Lithuania, Luxembourg, Portugal). Consequently, six countries score high risk for the independence of the PSM management (Cyprus, Ireland, Malta, Poland, Slovenia, and Spain), four score medium (Austria, Czech Republic, Romania, and Slovakia), and nine are assessed as at low risk from political influence over PSM management boards (Croatia, Finland, Germany, Latvia, Lithuania, Luxembourg, Netherlands, Portugal, and Sweden).

Risks From Funding

Examination of the legislation concerned with the funding of PSM revealed that six out of 19 studied countries do not have media law prescribing transparent and objective procedures on determining the amount of money to be granted to PSM (Austria, Cyprus, Latvia, Lithuania, Romania, and Slovenia). Furthermore, five out of 13 countries that do have appropriate legal provisions are evaluated as at risk due to the ways in which governments are able to decide the amount of money to be granted to the PSM (Ireland, Luxembourg, Malta, Slovakia, and Spain). In our sample, half of examined countries (n=9) have PSM that receives substantial direct state grants, which is considered to represent a risk to its independence, i.e. grants could be used as a point of pressure from the state. Overall, when it comes to risks from the PSM funding, five EU countries score high risk (Cyprus, Latvia, Lithuania, Romania, and Slovenia), five score medium risk (Austria, Luxembourg, Malta, Slovakia, and Spain), and half of all examined countries are at low risk from political influences from the ways in which the PSM is funded (see table 2 for details).

Table 2: Risks per mechanism and overall risk for political independence of the PSM

	Management risk in %	Funding risk in %	overall PSM risk in %
Austria	63	50	57
Croatia	25	0	13
Cyprus	100	100	100
Czech Republic	50	6	28
Finland	25	25	25
Germany	0	0	0
Ireland	100	13	57
Latvia	13	100	57
Lithuania	0	100	50
Luxembourg	0	38	19
Malta	100	44	72
Netherlands	25	25	25
Poland	67	0	34
Portugal	0	0	0
Romania	63	88	76
Slovakia	38	38	38
Slovenia	100	94	97
Spain	100	50	75
Sweden	13	0	7

Comparison of risks

It is interesting to note that the majority of countries either score low risk for both mechanisms (management and funding), or medium and high risk. To illustrate, PSM in Cyprus, Slovenia, Romania, Spain, Malta, Austria and Slovakia are at medium or high risk from both management and funding mechanisms, while Croatia, Germany, Portugal, Sweden, Finland and Netherlands have low risk assessments for both mechanisms. Hence, it could be speculated that countries with one type of risk are more likely to be at another type of risk for political independence.

In this context it is also interesting to more closely examine the cases in which there is little risk from one type of influence, but significant risk from another type. Baltic countries Latvia and Lithuania are in such a situation. Both countries score high risk from funding, but low risk from appointments. Low risks from the political influence via appointments to PSM board are based on the fact that, according to local teams, these countries have well implemented laws which provide fair, objective and transparent appointment procedures for management and board functions in PSM. For example, board members of the Latvia's PSM are selected in line with the procedures of an open competition, and appointed and dismissed by the National Electronic Mass Media Council, according to the Electronic Mass Media Law passed in 2010. When it comes to PSM funding, in both countries the PSM is primarily funded via state grants. Information about PSM's 2015 budget reveals that more than 70% of Latvia's PSM is funded by the state, while following the ban of advertising on Lithuanian PSM which came into force in 2015, Lithuania's PSM became fully funded by the state. Pečiulis (2010: 83) notes that funding schemes for the Lithuania's PSM have been discussed for over two decades, but that 'there was an impression that Lithuanian politicians realistically did not want the subscription fee to be introduced' in order to retain their ability to exert political influence over it.

There were several recommendations of how to improve the political independence and increase stability of revenue through various funding models, but none of them were implemented (Pečiulis, 2010). Similar developments were observed in Latvia where the Parliamentary committees did not support recommendations on funding from the working group consisting of media experts (Brikše, 2010). Brikše (2010: 74) sums up the developments in Latvia by saying that ‘there has been an entire lack of political readiness to identify a financing procedure that would ensure the independence of PSM, as well as sufficient resources to ensure high-quality content’. These examples show how although one mechanism for ensuring political independence may be well defined and implemented, this does not necessarily mean that the PSM is not at risk from political influence since political elites may be able to exert pressure via another type of mechanism.

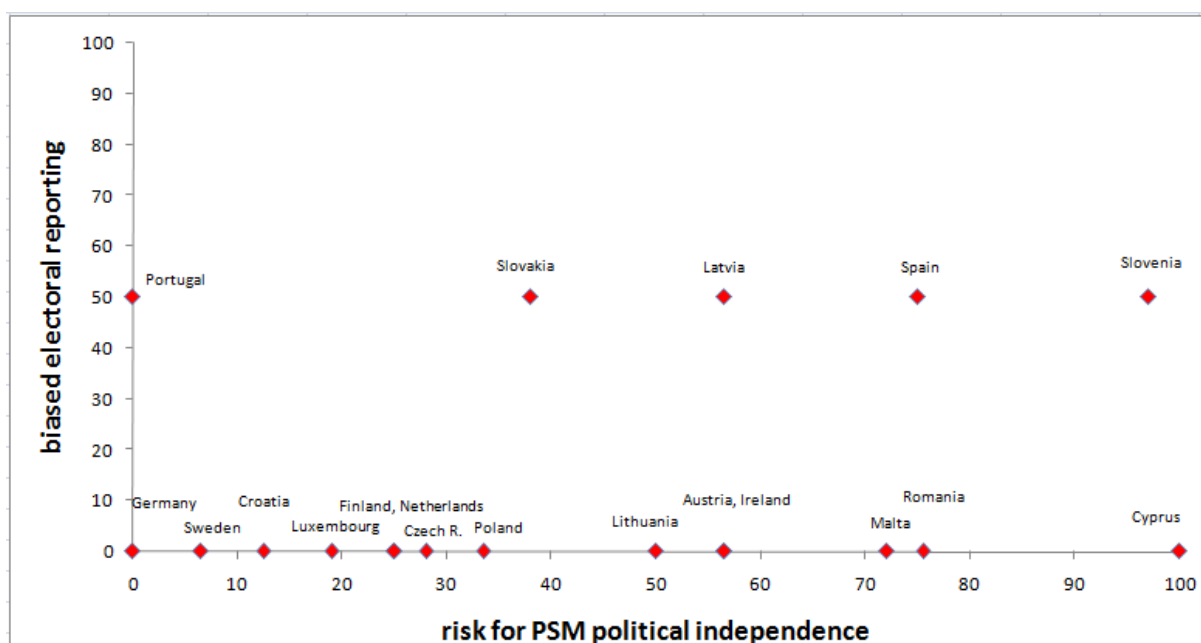
Implications

As mentioned in the introduction, it is considered important that public service media is politically independent and represents the interests of the public, and no one political group. This is because it is feared that PSM under political influence would produce biased content which would hinder citizens’ abilities to be well informed about public matters. However, it is wrong to assume that PSM is biased in its reporting just because it is under political influence, or that this has any kind of effect on voters.

In order to examine whether there is any kind of relationship between the risks for political independence of PSM and the way in which it reports politics, the findings of this analysis are compared with the data about the extent to which PSM reporting in each examined country is politically biased. Specifically, the indicator assessing the bias in PSM reporting was based on the question from the Media Pluralism Monitor 2015 which asked: ‘Is there evidence to suggest that audiovisual coverage of the electoral campaign on PSM offers proportional and non-biased representation of the different groups of political actors?’ In other words, local teams were asked to evaluate, based on available evidence (content analysis of PSM reports, NGO reports, regulator’s reports etc.), the extent to which PSM’s electoral reporting is biased. Answers were calibrated on a scale from 0 to 1 as was described previously (i.e. no evidence of bias was given a score of 0/0%, some evidence of bias 0.5/50%, and if there was evidence that different groups of political actors are represented in a biased and non-proportional way, clearly favouring some political actors over others, a score of 1/100% was given).

The comparison of risks for PSM’s political independence and the political bias in its electoral reporting shows that certain relationships exist between risks from political influence and biased reporting. For example, those public service media which have biased content are somewhat probable to also be at medium or high risk from political interference, since four out of five PSM which have biased content are also at risk from political interference. On the other hand, only one out of eight PSM which is assessed as at low risk for political independence has some bias in its reporting.

Graph 1: Relationship between risks for PSM political independence and the bias in PSM electoral reporting



However, what Graph 1 also reveals is that there are many countries in which PSM is at a medium or high risk from political influence, but its content remains balanced and unbiased. Specifically, this is the case in seven out of 11 Member States whose PSM is assessed as at medium or high risk (Austria, Cyprus, Ireland, Lithuania, Malta, Poland, and Romania). One reason for this may be the fact that all examined countries have a media law which imposes rules aiming at fair, balanced and impartial representation of political viewpoints in news and informative programmes on PSM channels and services (Brogi et al., 2016). Furthermore, only two countries in the sample do not have specific legal provisions which would impose rules aiming at guaranteeing access to airtime on PSM channels and services for political actors during election campaigns, Austria and Finland, however in Finland the PSM's Administrative council sets guidelines to ensure balanced access prior to each elections (Brogi et al., 2016). Nord (2015) notes that there is regulation ensuring access to PSM content during electoral campaigns also in other EU countries which have not been captured by the sample used for analysis in this paper. This all points to the fact that although the state may be able to exert some pressure over the PSM, its content can be safeguarded from political influence by regulation which aims to ensure pluralism in PSM reporting.

Conclusions

The study reported in this paper was set out to examine risks for political independence of the EU Member States' public service media. The data to perform this analysis was collected through the Media Pluralism Monitor 2015 project in which local teams across 19 EU countries answered a series of questions about national media policies and their implementation, with some of the evaluations of the quality of implementation being reviewed by a group of national media experts.

It should be emphasized again that the presented study is a risk analysis, hence it does not reveal whether or not PSM actually is under political influence, and what kind of consequences this has on its functioning, content and audience reception. This can, of course, be considered as a limitation of the project. Furthermore, it should be acknowledged that the results might be different if other mechanisms through which the state can influence the PSM have been considered (e.g. information about adequacy of budget, accountability to state, PSM board's decision practice, board members'

term of office), and if different variables have been used for establishing risks from management and funding. However, it was necessary to focus on main mechanisms of exerting pressure, and a limited number of variables assessing them, due to the extensiveness of project's comparative dimension and its other constraints (time, resources).

The results of this analysis show that in five out of 19 analysed countries media policies do not provide fair, objective and transparent appointment procedures for management and board functions in PSM, which would minimise state's ability to interfere. Furthermore, more than half of the countries that considered national media policy on appointment procedures to be well defined in safeguarding PSM's independence, declared some degree of risk in the implementation of this policy, pointing to situations in which the government or other political groupings have in the past few years tried to interfere with the appointment processes. Also, results show that there are large differences in the mechanisms of funding PSM, and consequently in the ability of the state to interfere in the PSM. In some EU countries PSM is completely funded from the state budget (e.g. Finland, Luxembourg), in some others the governments do not directly participate in its funding (e.g. Sweden, Austria).

Overall, results point to differences in media policies concerned with PSM's political independence among EU countries, with many risks associated to these policies and their implementation. Trends detected by this study point to the conclusion that public service media in countries of Western and Northern Europe are at less risk from political influence, than those in Central Eastern and Southern Europe, with some notable exceptions. This suggests that these PSM systems should be still considered vulnerable to political influence, what can decrease the quality of their content and the trust that citizens have in them. As the case of Portugal indicates, the introduction of appropriate legislation and changes in funding mechanisms towards those which minimise state's ability to exert pressure through providing funds may decrease the risks from political influence. However, the implementation of these new laws needs to be monitored so it can be determined whether they are effective in practice in safeguarding PSM from political influences. Recent legislative changes in Poland, which grant the government increased powers over Polish PSM's management boards, confirm that national legislations concerned with PSM independence are in constant flux in Europe, but also that these changes do not necessarily reflect the aim to increase PSM's political independence.

Regular monitoring of the risks for political independence of the public service media in Europe would therefore be beneficial since it would periodically map the state of play of risks for political independence of public service media and could serve as a measure of early warning for systems in which vulnerabilities are detected.

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